

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 21-CR-10350-LTS
)	
(1) Harry TAM, a/k/a “Legendary H,” a/k/a/)	
“HK”; a/k/a Harry Kiahhi TAM)	
(2) Tony NGUYEN;)	
(3) Marcus LEYDEN a/k/a “Pyrex”)	
(4) Henry VUONG;)	
(5) Robert OSTRANDER;)	
(6) James COLAMARIA)	
(7) Vincent DUONG,)	
(8) Colin HEA)	
(9) Eli SANDERS; and)	
(10) Jacob PARLIN, a/k/a Jake”,)	
Defendants.)	

UNITED STATES' BILL OF PARTICULARS FOR FORFEITURE OF ASSETS

The United States of America, by and through its attorney, Rachael S. Rollins, United States Attorney for the District of Massachusetts, hereby files the following Bill of Particulars for Forfeiture of Assets.

On December 23, 2021, a federal grand jury sitting in the District of Massachusetts returned a eleven-count Indictment charging defendant Harry Tam (the “Defendant”), amongst others, with Conspiracy to Distribute and to Possess with Intent to Distribute 50 Grams or More Of Methamphetamine, in violation of 21 U.S.C. § 846 (Count One); Distribution of and Possession with Intent to Distribute 50 Grams or More of Methamphetamine; Aiding and Abetting, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A)(viii) and 18 U.S.C. § 2 (Counts Two through Six); Possession of a Firearm in Furtherance of a Drug Trafficking Offense, in violation of 18 U.S.C. § 924(c) (Counts Seven through Nine); and Felon in Possession of a Firearm and Ammunition, in violation of 18 U.S.C.

§ 922(g)(1) (Count Ten); and Possession of a Firearm with an Obliterated Serial Number, in violation of 18 U.S.C. § 922(k) (Count Eleven);

The Indictment included a Drug Forfeiture Allegation which gave the Defendant notice that the United States intended to seek forfeiture, pursuant to 21 U.S.C. § 853, upon conviction of one or more of the offenses alleged in Counts One through Six of the Indictment, of any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense; and any property used or intended to be used, in any manner or part, or to facilitate the commission of, such offenses.¹

Pursuant to, and without limiting in any manner the Drug Forfeiture Allegation of the Indictment, the United States hereby gives notice that it is seeking forfeiture, without limitation, of the following specific property:

- (a) One white 2020 Lexus RX450H, bearing VIN number JTJHGKFA5L2011348, seized on or about March 23, 2022; and
- (b) \$9,550 in United States currency, seized from Harry Tam on or about December 2, 2021.

Respectfully submitted,

RACHAEL S. ROLLINS
United States Attorney

By: /s/ Carol E. Head
NADINE PELLEGRINI
CAROL E. HEAD
Assistant United States Attorneys
U.S. Attorney's Office
1 Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3100
carol.head@usdoj.gov

Dated: August 26, 2022

¹ The Indictment also contained a Firearm Forfeiture Allegation.